

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(SPARTANBURG DIVISION)

JANE DOES 1-9,  
Plaintiff/Petitioner/USA,

Case No. 7:20-cv-00947-JD

v.

**Motion  
in Support of  
*Pro Hac Vice* Application**

COLLINS MURPHY, SHARON HAMMONDS,  
BRENDA F. WATKINS, LIMESTONE UNIVERSITY,  
MG FREESITES, LTD., d/b/a PORNHUB.COM,  
MG FREESITES II LTD., MINDGEEK S.A.R.L.,  
MINDGEEK USA, INC., MG BILLING LTD.,  
and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM,  
TRAFFICSTARS LTD., WISEBITS LTD,  
XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD, )  
Defendant/Respondent. )  
\_\_\_\_\_ )

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Benjamin W. Bull be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of Columbia federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).
 

☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☐ does not intend to oppose  
☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):  
 \_\_\_\_\_  
 \_\_\_\_\_

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Bell Legal Group, LLC.

Firm Name

219 North Ridge Suite

Street Address or Post Office Box

J. Edward Bell III

Name of Local Counsel

s./J. Edward Bell, III

Signature of Local Counsel

Georgetown, SC 29440

City, State, Zip Code

(843) 546-2408

Telephone Number

jeb@belllegalgroup.com

E-Mail Address

Local Counsel for the Plaintiff

District of South Carolina

Federal Bar Number: 1280